

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S FIRST SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS RACHEL (PR/USPS-T-8: 1-3)

(December 21, 2011)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Due to availability of the Public Representative and staff to review Postal Service answers, and the press of other business over the coming holidays, the Public Representative proposes that the witness provide answers no later than January 12, 2012, rather than the customary 14 days. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for
Docket No. N2012-1

901 New York Ave, N.W. STE 200
Washington, DC 20268-0001
(202) 789-6889; Fax (202) 789-6891
christopher.laver@prc.gov

PR/USPS-T-8-1

Please provide the total current number of Full Time Equivalent (FTE) employees and an estimate of the number of non-managerial FTEs that would need to be eliminated in order to implement the proposal in this docket by the following categories.

- a. FTE Clerks.
 - i. Current Total
 - ii. Estimated Number Required to be Eliminated
- b. FTE Mail Handlers
 - i. Current Total
 - ii. Estimated Number Required to be Eliminated
- c. FTE Motor Vehicle Operators
 - i. Current Total
 - ii. Estimated Number Required to be Eliminated
- d. FTE Maintenance Personnel
 - i. Current Total
 - ii. Estimated Number Required to be Eliminated

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Please provide the number of non-managerial employees that do not have layoff protection in the following categories.

- a. FTE Clerks.
- b. FTE Mail Handlers
- c. FTE Motor Vehicle Operators
- d. FTE Maintenance Personnel

PR/USPS-T-8-3

Please refer to your testimony at page 13, which mentions several avenues through which existing Postal Service employees may exit the Postal Service, including Very Early Retirement, Attrition, and Layoffs. Please provide a breakdown, of all bargaining and non-bargaining Clerks, Mail Handlers, Motor Vehicle Operators, and Maintenance Personnel, for Fiscal Years 2005 through 2010, who:

- a. Took early retirement,
- b. Took optional retirement,
- c. Were laid off,
- d. Separated from the Postal Service for any other reason, or

e. Were new FTE hires.